

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF NEW YORK**

Britney Rudler,  
*individually, and on behalf of all others similarly  
situated,*

Plaintiffs,

v.

MLA Law Offices, LTD, et al.

Defendants.

Docket No. 19-cv-2170

**DECLARATION OF  
J. REMY GREEN**

STATE OF NEW YORK            )  
  ) ss.:  
COUNTY OF KINGS            )

I, Remy Green, being duly sworn, depose and say:

1. I am a partner at Cohen&Green P.L.L.C., the attorneys of record for Plaintiff Britney Rudler.

2. I provide this declaration as required by Local Rule 83.6(a), and to put certain documents in my control in the record.

3. The Court has already stated that if Defendants fail to produce certain post judgment discovery, it will hold them in contempt.

4. The deadline, per the Court's August 10, 2022 Minute Order<sup>1</sup> — extending the deadline set initially for May 16, 2022 in ECF No. 100 — was August 30, 2022.

5. The parties have an agreement that all documents should be served electronically.

6. As set out in Plaintiff's letter at ECF No. 118 (attached as **Exhibit 2**), Plaintiff has not agreed to any extensions of the deadline — except as to the deadlines for two specified categories of bank records.

---

<sup>1</sup> A copy of that Order is attached as **Exhibit 1**.

7. Defendants have not served any responses.

8. Moreover, and relevant to the contempt analysis, Defendants appear to have not acted with any diligence. Attached as **Exhibit 3** is a declaration I made to file after a phone conversation with Defendant Malevitis (who is counsel for the corporate defendant).

9. As set out therein, Defendants appeared to — even on *the day post-judgment discovery was due* under the Court’s Order at ECF No. 100 (with contempt as a possible consequence) — not even have a basic understanding of what discovery was at issue.

10. That issue has continued in various conversations, and indeed, it was only in the last few weeks — as I understand it — that Mr. Malevitis has understood that there are two discovery requests even at issue.

11. Additionally, based on a number of conversations with him, my understanding is that Mr. Malevitis, at the earliest, began attempts to sincerely comply with the information subpoenas in the last few weeks or days.

I declare, under penalty of perjury, that the statements above are true and correct.

Executed On: Aug. 31, 2022

/s/

---

J. Remy Green